

Exhibit A-17

SEC v. Mueller, et al
Case No. 5:21-cv-785-XR

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
 AMENDED INITIAL DISCLOSURES**

**ATTACHMENT 1
 IDENTIFICATION OF PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION**

A list of persons likely to have discoverable information that the SEC may use to support its claims, unless the use would be solely for impeachment, is set forth below:

1. Defendants and Relief Defendants
2. The following current or former employees, consultants, agents, and/or independent contractors of the Defendants and Relief Defendants are likely to have discoverable information regarding the allegations of the SEC's Complaint, including, among other things: (1) the Defendants' written and oral communications with investors, prospective investors, lenders, auditors, accountants, bookkeepers; (2) Defendants and Relief Defendants' business operations; and (3) as well as Defendants' financial, bookkeeping, and accounting activities.

Name	Address	Telephone
Lauren R. "Becca" Adams	12019 Treewell Glen San Antonio, TX 78249	(843) 903-2854 (717) 818-0307
Scott L. Allen	c/o William Marsh, Esq. Haynes and Boone, LLP 2323 Victory Avenue Suite 700 Dallas, TX 75219-7672	(214) 651-5031
Eric Dandridge	120 Rocky Path Boerne, TX 78006	(918) 277-1130/1132
David A. Lehuquet	2900 FM 971 Georgetown, TX 78626-4419	(512) 940-7367
Cary Mueller	c/o Gordon C. Young, Esq. Barr & Young Attorneys 318-C Diablo Road Danville, CA 94526	(925) 314-9999, ext. 302
Nathan Spradlin	c/o Andrew R. Shedlock, Esq. Kutak Rock LLP 60 South Sixth Street Suite 3400	(612) 334-5022

	Minneapolis, MN 55402-4018	
Iolani L. Young	Iolani L. Young 27223 Trinity Bend San Antonio, TX 78261	(808) 688-6335 (808) 668-7466
Persons most knowledgeable and unknown employees and persons formerly associated with Relief Defendants		
Persons most knowledgeable and unknown employees and persons formerly associated with Deeproot Funds, LLC.		
Persons most knowledgeable and unknown employees and persons formerly associated with Policy Services, Inc.		

3. The following persons who were contractors, service providers, “finders,” brokers, financial advisors, or vendors who performed work or provided services on behalf of Defendants and/or Relief Defendants and are likely to have discoverable information regarding the allegations of the SEC’s Complaint, including, Defendants’ and/or Relief Defendants’ business operations, communications, viatical settlement or life policy activities, as well as the Defendants’ and/or Relief Defendants’ financial activities and accounting practices.

Name	Address	Telephone
Charlotte Acker	2313 Brittany Grace New Braunfels, TX 78130-8937	(325) 388-8460 (210) 862-9622
Ken Abramson Abramson Accountancy Corp.	23901 Calabasas Road Suite 1072 Calabasas, CA 91302	(818) 918-4500
Chris Williams Williams Steinert Mask, LLP	1100 NE Interstate 410 Loop Suite 350 San Antonio, TX 78209	(210) 684-1071
Thomas N. Andrew Cycladic International LLC	Thomas D. Sherman, Esq. Locke Lord, LLP Terminus 200, Suite 1200 3333 Piedmont Road, N.E. Atlanta, GA 30305	(404) 870-4672

Brokers, “finders,” agents, financial advisors, or other persons known to Defendants who introduced, advised, or referred potential investors in connection with securities offered by the Defendants or their affiliates in exchange for a fee, bonus, or any other form of compensation from the Defendants or their affiliates		
Person most knowledgeable and unknown employees of contractors, vendors, or service providers to Defendants.		

4. Investors known to Defendants or Relief Defendants and/or identifiable by name, address or other information in Defendants’ or their agents’ books and records, are likely to have discoverable information regarding the allegations of the SEC’s Complaint, including, Defendants’ and Relief Defendants’ business operations, their communications to investors, and their sales efforts and success with investors. The SEC may use testimony and or the document of any one or more of these investors to support its claims:

Name	Address	Telephone
Brad Leon	N/A	828-273-0205
Sandra Thompson	4396 N. Atfield Place, Tucson, AZ 85719	520-405-1402
Robert Kane	3528 W Starr Pass Blvd, Tucson, AZ 85745-9500	Mr. Kane’s attorney: Jeffrey Gardner, Jennings Strouss LLP: 602-262-5818 or jgardner@jsslaw.com
John Gray	N/A	713-705-7973

James Donnelly	N/A	480-490-0670, rioverdejim@gmail.c om, Jim.Donnelly@srpnet .com

5. Any custodial and business record witnesses in support of the admissibility of documents at trial, as may be made necessary for use at trial by Defendants' objections to the admissibility of any documentary evidence described in Attachment 2 or produced in the litigation.
6. In addition to the foregoing disclosure of persons likely to have discoverable information that the SEC may use to support its claims in motions or at trial, the SEC gives notice that one or more SEC employees may be designated at the appropriate time and called at trial as a summary witness only, to testify concerning summary analysis of communication records, financial records, and other records obtained in the investigation or litigation of this matter. The SEC will furthermore provide an appropriate disclosure of any expert witness or witnesses it may elect to use at trial when called for by the rules or scheduling order entered by the Court.

ATTACHMENT 2
DESCRIPTION OF DOCUMENTS SUPPORTING PLAINTIFF SEC'S CLAIMS

A list of documents, electronically-stored information, and tangible things that the SEC has in its possession, custody, or control, and which may be used by the SEC to support its claims, unless the use would be solely for impeachment, is set forth below:

- 1) Investigative testimony transcripts for the following witnesses:
 - a. Scott Allen
 - b. Cary Mueller
 - c. Robert Mueller
 - d. Jonmark Richardson
 - e. Nathan Spradlin
 - f. Thomas Andrew
- 2) Exhibits marked during the investigative testimonies set forth in item 1 above.
- 3) Document productions obtained from:
 - a. Abramson Accountancy Corporation
 - b. Accordia Life and Annuity Co.
 - c. Scott Allen
 - d. Amazon.com, Inc.
 - e. American Airlines
 - f. American Express
 - g. Americus Diamond
 - h. Asset Servicing Group
 - i. BDO, USA, LLP
 - j. Jun Chang
 - k. Citibank, N.A.
 - l. Crombie Financial
 - m. Cycladic International
 - n. Deeproot 575 Fund, LLC
 - o. Disney
 - p. James Donnelly
 - q. ETrade Financial Corporation
 - r. Federal Reserve Bank of Atlanta
 - s. Federal Reserve Bank of New York
 - t. FinanceIt Inc.
 - u. Financial Horizon Concepts
 - v. FINRA
 - w. First Horizon Bank
 - x. Food Development Corp. of Texas

- y. Hollie Gandy (Safe Money Solutions)
- z. INF Solutions
- aa. JMB Financial Services, LLC
- bb. JP Morgan Chase Bank
- cc. Kauai Vacation Rentals
- dd. Life Insurance Company of the Southwest
- ee. Life Partners Position Holder Trust
- ff. Lux Catering and Events
- gg. McNamara Capital Investment Group
- hh. Michelle Leo Events
- ii. Greg Minear
- jj. Cary Mueller
- kk. Robert Mueller
- ll. Jack Nace
- mm. Old Republic Title Company
- nn. OnPay
- oo. PayChex
- pp. PayPal
- qq. PGH Advisors
- rr. Policy Services Inc.
- ss. Princess Cruise Lines
- tt. Principle Auto
- uu. Jonmark Richardson
- vv. David Rosen
- ww. Eric Rudd
- xx. Saint Mary's Hall
- yy. Randy Seymour
- zz. Silicon Drive Office Ventures
- aaa. Sooner Sports Properties
- bbb. Nathan Spradlin
- ccc. Darryl Stein
- ddd. Dana Sullivan
- eee. Tabora Gallery
- fff. The Clearing House Payments Company
- ggg. The Lincoln National Life Insurance Company
- hhh. United Airlines
- iii. USAA Federal Savings Bank
- jjj. John Vizy
- kkk. Wells Fargo Bank N.A.
- lll. West Coast Life Insurance

mmm. Wheels Up Partners

nnn. Williams, Steinert, Mask, LP

ooo. Wilmington Savings Fund Society Bank

4) Declarations from:

- a) Brad Leon
- b) Sandra Thompson
- c) Ken Abramson
- d) Gerald Wik
- e) George Williams
- f) John Gray
- g) James Donnelly
- h) Phillip Forret